

# KING & SPALDING

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October 3, 2016

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (MG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. As noted previously, New GM filed a motion (“**Stay Motion**”) with the Second Circuit seeking a stay of the Mandate for the Second Circuit’s Opinion issued on July 13, 2016. On September 30, 2016, the Second Circuit denied the relief requested in the Stay Motion and issued the Mandate. Copies of the Second Circuit’s Order denying the Stay Motion and the Mandate are attached hereto as Exhibits “A” and “B” respectively.

If the Court has any questions or needs additional information, please let me know.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/hs  
Encl.

cc: Parties Set Forth On Schedule "1" Annexed Hereto.

**SCHEDULE 1**

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**Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt. No. 13634]**

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**Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt. No. 13655]**

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<p>Paul Vernon Minix, Jr. Dewitt County Jail 208 E. Live Oak Cuero, TX 77954</p> <p><i>Minix – Pro Se Plaintiff</i></p>	<p>Paul Minix 2330 Quail Lane Longview, Texas 75602</p> <p><i>Minix – Pro Se Plaintiff</i></p>

**Parties Subject to the Pilgrim Motion to Enforce**

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